Richard Kurnit (RK-2504)

Maura J. Wogan (MW-9589)

Nicole I. Hyland, Esq. (NH-7646)

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488 Madison Avenue, 10<sup>th</sup> Floor

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W. Eric Baisden (Ohio Bar No. 0055763)

Jeffrey J. Lauderdale (Ohio Bar No. 0074859)

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800 Superior Avenue, Ste. 1400

Cleveland, Ohio 44114-2688

Tel.: 216-622-8200 Fax: 216-241-0816 ebaisden@calfee.com ilauderdale@calfee.com

Attorneys for Defendant GCA Services Group, Inc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

-----X **BUILDING SERVICE 32B-J BENEFIT** FUNDS,

Plaintiff,

-against-

GCA SERVICES GROUP, INC.,

Defendant.

Case No. 07 Civ. 8381 (HB)

MOTION FOR ADMISSION PRO HAC VICE OF W. ERIC

BAISDEN, ESQ.

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Richard Kurnit, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

W. Eric Baisden (Ohio Bar No. 0055763) Calfee, Halter & Griswold LLP 1400 KeyBank Center

FKKS: 343352.v1 7224.300 800 Superior Avenue Cleveland, Ohio 44114-2688

Tel.: (216) 622-8200 Fax: (216) 241-0816 <u>ebaisden@calfee.com</u>.

W. Eric Baisden is a member in good standing of the Supreme Court of Ohio, the

U.S.D.C. Northern District of Ohio, the U.S.D.C. Southern District of Ohio, and the U.S.D.C. for the Western District of Michigan.

There are no pending disciplinary proceedings against W. Eric Baisden in any State or Federal court.

Dated: New York, New York February 25, 2008

Respectfully submitted,

FRANKFURT KURNIT KLEIN & SELZ,

P.C.

By:

Richard Kurnit (RK-2504) Maura J. Wogan (MW-9589)

Nicole I. Hyland (NH-7646)

488 Madison Avenue

New York, New York 10022

Tel: (212) 826-5523 Fax: (347) 438-2121 mwogan@fkks.com

Attorneys for Defendant, GCA Services Group, Inc.

TO: Michael Geffner (MG-6785) RAAB, STURM & GOLDMAN, LLP 317 Madison Avenue New York, New York 10017

Attorneys for Plaintiffs Building Service 32B-J Benefit Funds

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Richard Kurnit (RK-2504)
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ebaisden@calfee.com
ilauderdale@calfee.com
Attorneys for Defendant GCA Services Group, Inc.
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
BUILDING SERVICE 32B-J BENEFIT
FUNDS,
                                             Case No. 07 Civ. 8381 (HB)
            Plaintiff,
                                             AFFIDAVIT OF RICHARD
      -against-
                                             KURNIT IN SUPPORT OF
                                             MOTION TO ADMIT W. ERIC
GCA SERVICES GROUP, INC.,
                                             BAISDEN, ESQ. PRO HAC VICE
            Defendant.
STATE OF NEW YORK
                         ) SS.
COUNTY OF NEW YORK )
```

RICHARD KURNIT, being duly sworn, hereby deposes and says as follows:

7224.300 FKKS: 343353.v2

Filed 02/25/2008

- I am a partner in the law firm of Frankfurt Kurnit Klein & Selz, P.C., counsel for 1. defendant GCA Services Group, Inc. ("GCA"). I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of facts set forth herein and in support of GCA's motion to admit W. Eric Baisden as counsel pro hac vice to represent GCA in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on January 26, 1976. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
  - 3. I have known W. Eric Baisden since 2007.
- Mr. Baisden is a partner with the law firm of Calfee, Halter & Griswold LLP in 4. Cleveland, Ohio.
- 5. I have found Mr. Basiden to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- 6. Accordingly, I am pleased to move the admission of W. Eric Baisden pro hac vice.
- 7. I respectfully submit a proposed order granting the admission of W. Eric Baisden, pro hac vice, which is attached hereto as Exhibit A.

FKKS: 343353.v2 7224.300 WHEREFORE, it is respectfully requested that the motion made to admit W. Eric Baisden, *pro hac vice*, to represent GCA in the above-captioned matter be granted.

Respectfully submitted,

Richard Kurnit (RK-2/504)

SWORN TO before me this 25th day of February 2008.

Hotary ruone

ROSEMARY SETTEDUCATO
Notary Public, State of New York
No. 24-4678133
Qualified in New York County
Commission Expires Dec 31, 20

FKKS: 343353.v2 7224.300

# The Supreme Court of Phio

Document 11

### CERTIFICATE

I, SUSAN B. CHRISTOFF, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

### William Eric Baisden

was admitted to the practice of law in Ohio on November 18, 1991; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

> IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 8th day of February, 2008.

SUSAN B. CHRISTOFF

Director, Attorney Services Division

(Rev. 10/98) AO 136

# **CERTIFICATE OF GOOD STANDING**

UNITED STATES OF AMERICA

NORTHERN DISTRICT OF OHIO

SS.

I, GERI M. SMITH, Clerk of the United States Court for the Northern District of Ohio, Eastern Division,

DO HEREBY CERTIFY, that W. ERIC BAISDEN, Bar #0055763, was duly admitted to practice in said

Court on December 27, 1991, and is in good standing as a member of the bar of said Court.

Dated at Cleveland, OH

on February 8, 2008

**GERI M. SMITH** 

Clerk of Court

Deputy Clerk



# CERTIFICATE OF GOOD STANDING

I, James Bonini, Clerk of this Court, certify that

W. ERIC BAISDEN #0055763

was duly admitted to practice in this Court on

November 30, 2005

and is in good standing as a member of the Bar of this Court.

Dated at Columbus, Ohio on February 14, 2008.

JAMES BONINI, CLERK

By: Shawntel Jackson, Deputy Clerk

Trantel Goodson

### UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN OFFICE OF THE CLERK

www.miwd.uscourts.gov

399 Federal Bldg. 110 Michigan St., NW Grand Rapids, MI 49503 (616) 456-2381 B-35 Federal Bldg. 410 W. Michigan Ave. Kalamazoo, MI 49007 (269) 337-5706 113 Federal Bldg. 315 W. Allegan St. Lansing, MI 48933 (517) 377-1559

229 Federal Bldg. 202 W. Washington St. Marquette, MI 49855 (906) 226-2021

## **CERTIFICATE OF GOOD STANDING**

I, Ronald C. Weston, Sr., Clerk of the United States District Court for the Western District of Michigan, do hereby certify that

### **ERIC BAISDEN**

was duly admitted to practice in said Court on July 13, 2006 and is in good standing as a member of the bar of said Court.

Ronald C. Weston, Sr., Clerk

Dated at Grand Rapids, Michigan, on February 11, 2008

· Jauren T

Richard Kurnit (RK-2504)
Maura J. Wogan (MW-9589)
Nicole I. Hyland, Esq. (NH-7646)
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W. Eric Baisden (Ohio Bar No. 0055763)
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Attorneys for Defendant GCA Services Group, Inc.

### 

Upon the motion of Richard Kurnit, Frankfurt Kurnit Klein & Selz, P.C., attorney for defendant GCA Services Group, Inc. and Richard Kurnit's affidavit in support:

IT IS HEREBY ORDERED that:

W. Eric Baisden (Ohio Bar No. 0055763) Calfee, Halter & Griswold LLP 1400 KeyBank Center

FKKS: 343383.v1 7224.300

800 Superior Avenue Cleveland, Ohio 44114-2688

Tel.: (216) 622-8200 Fax: (216) 241-0816 ebaisden@calfee.com

is admitted to practice *pro hac vice* as counsel for GCA Services Group, Inc. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at <a href="https://www.nysd.uscourts.gov">www.nysd.uscourts.gov</a>. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated:

SO ORDER	ED:		
U.S.D.J.			

### **AFFIDAVIT OF SERVICE**

STATE OF NEW YORK ) ) SS. COUNTY OF NEW YORK )

I, Mary C. Warden, state that I am over eighteen years of age and reside in Long Beach, New York.

On Monday, February 25, 2008, I served the attached MOTION FOR ADMISSION PRO HAC VICE OF W. ERIC BAISDEN, ESQ. and AFFIDAVIT OF RICHARD KURNIT IN SUPPORT OF MOTION TO ADMIT W. ERIC BAISDEN, ESQ. PRO HAC VICE by depositing a true copy thereof in a post-paid wrapper, in an official depository under the exclusive care and custody of the United States Postal Service, and via electronic mail, upon the following at their last known address:

> Michael Geffner, Esq. RAAB, STURM & GOLDMAN, LLP 317 Madison Avenue New York, New York 10017.

SWORN TO before me

this 25th day of February 2008

Notary Public

of Maye York

Qualified or Knigs County Commission Expires October 23, 19